

UNITED STATES DISTRICT COURT

for the

Middle District of Alabama

Davita M. Key

v.

Dynamic Security, Inc.

Case No.:

BILL OF COSTS

Judgment having been entered in the above entitled action on March 30, 2023 against Dynamic Security, Inc.,
Date

the Clerk is requested to tax the following as costs:

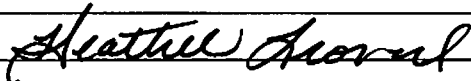
Fees of the Clerk	\$ <u>\$400.00</u>
Fees for service of summons and subpoena	<u>\$200.00</u>
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	<u>\$9,255.45</u>
Fees and disbursements for printing	<u>\$3,429.67</u>
Fees for witnesses (itemize on page two)	<u>\$374.82</u>
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.	<u>\$5</u>
Docket fees under 28 U.S.C. 1923	<u>\$0</u>
Costs as shown on Mandate of Court of Appeals	<u>\$0</u>
Compensation of court-appointed experts	<u>\$0</u>
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	<u>\$0</u>
Other costs (please itemize)	<u>\$1716.90 (trial hotel)</u>
TOTAL	\$ <u>\$15,381.84</u>

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.**Declaration**

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☐ Electronic service☐ First class mail, postage prepaid☐ Other:

s/ Attorney:

Name of Attorney: Heather Leonard

For:

Davita M. Key

Date:

3/28/24

Name of Claiming Party

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By:

Clerk of Court

Deputy Clerk

Date

2/28/2023 Billable Copies - Doc. 155 - Defendant's Voir Dire	8
3/8/2023 Billable Copies - Doc. 165 - Dynamic's Response to PL 1st MIL - Cureton as a Minister	7
3/8/2023 Billable Copies - Doc. 166 - Dynamic's response to PL 2nd MIL - Dismissed Claims	13
3/8/2023 Billable Copies - Doc. 167 - Dynamic response to PL 3rd MIL - EEOC Determination	5
3/8/2023 Billable Copies - Doc. 168 - Dynamic Response to PL 4th MIL - DOL Finding	5
3/8/2023 Billable Copies - Doc. 174 - Order Denying Interlocutory Appeal	6
3/16/2023 Billable Copies - Doc. 175 - Notice of Availability of Juror Profiles	2
3/24/2023 Billable Copies - Doc. 178 - Pretrial Order	10
7/11/2023 Billable Copies - Doc. 211 - Def Reply Brief on Post-Trial Motions	51
3/11/2024 Billable Copies - Doc. 212 - Order on post-trial motion	10
3/18/2024 Billable Copies - Doc. 213 - Memorandum Opinion and Order on Injunctive Relief	8
5/20/2020 Billable Copies - Doc. 23 - Motion to Amend Complaint	33
5/20/2020 Billable Copies - Doc. 24 - Response to Motion to Dismiss	24
7/15/2020 Billable Copies - Doc. 25 - HMMA MTD Reply	17
6/1/2020 Billable Copies - Doc. 27 - Order Granting Motion to Amend Complaint	0
6/2/2020 Billable Copies - Doc. 28 - Amended Complaint	28
6/2/2020 Billable Copies - Doc. 29 - Order Mooting MTDs	1
6/15/2020 Billable Copies - Doc. 31 - HEA MTD	14
6/15/2020 Billable Copies - Doc. 32 - Dynamic Security MTD	20
6/17/2020 Billable Copies - Doc. 33 - Briefing Order	1
7/8/2020 Billable Copies - Doc. 34 - Response to MTD	21
7/15/2020 Billable Copies - Doc. 36 - Dynamic Security MTD Reply	7
7/17/2020 Billable Copies - Doc. 37 - HEA MTD Reply	11
8/31/2021 Billable Copies - Doc. 38 - Order and Opinion on MTD	33
9/1/2021 Billable Copies - Doc. 40 - Order on When to Hold Rule 26 Conference	2
9/15/2021 Billable Copies - Doc. 42 - ANSWER to [28] Amended Complaint by Hyundai Engineering America, Inc..	22
9/15/2021 Billable Copies - Doc. 43 - Answer and Defenses to Plaintiff's Amended Complaint	31
9/23/2021 Billable Copies - Doc. 44 - MOTION for Extension of Time to File Report of Parties' Planning Meeting by Hyundai Motor Manufacturing	2
9/27/2021 Billable Copies - Doc. 46 - REPORT of Rule 26(f) Planning Meeting	15
9/27/2021 Billable Copies - doc. 47 and Doc. 47-1 Joint Motion for Protective Order and Protective Order	12
9/27/2021 Billable Copies - Doc. 48 - Privacy Protective Order	6
11/8/2021 Billable Copies - Doc. 49 - ORDER: it is ORDERED that this matter is SET for a hearing by status and scheduling conference on 11	1
11/30/2021 Billable Copies - Doc. 51 - UNIFORM SCHEDULING ORDER Final Pretrial Conference set for 9.22.2022,	5

UNITED STATES DISTRICT COURT

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☐ Electronic service☐ First class mail, postage prepaid☐ Other:

s/ Attorney:

Name of Attorney: Heather Leonard

For: Davita M. Key
Name of Claiming Party

Date: 3/28/24

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

Clerk of Court

By: _____

Deputy Clerk

Date

Heather Leonard PC-in-office
copies

Time

for Key v Hyund Inc. | Dynamic Security

Expense entries

Date	Description	Quantity
3/23/2023	2023.03.23 - Staples - \$181.72 - Key Trial - Flip Chart, Visual Aids	1
10/20/2022	Billable Copies	625
2/7/2023	Billable Copies - Copies for Summary Judgment Hearing	268
3/13/2023	Billable Copies - Cureton 2023.03.13 - re subpoena mail	3
8/29/2022	Billable Copies - Def documents referencing witness for deposition	566
3/23/2023	Billable Copies - Defendant's Trial Exhibits	792
6/19/2022	Billable Copies - deposition exhibits for 30(b)(6) deposition - HMMA (will use in other depositions as well)	269
1/9/2023	Billable Copies - Doc. 90 - Show Cause on Motion to Strike Jury Demand	1
1/27/2023	Billable Copies - Doc. 100 - Dynamic Depo Designation	7
1/27/2023	Billable Copies - Doc. 101 - PL Witness List	163
1/27/2023	Billable Copies - Doc. 102 - PL Exhibit List	9
1/27/2023	Billable Copies - Doc. 103 - Reply on Motion to Strike Jury Demand	18
1/27/2023	Billable Copies - Doc. 104 - Motion to continue pretrial conference	3
2/3/2023	Billable Copies - Doc. 108 - Order to Show Cause	0
2/9/2023	Billable Copies - Doc. 122 - HMMA Obj to PL Witness List	3
2/9/2023	Billable Copies - Doc. 123 - HMMA Obj to Depo Designations	15
2/9/2023	Billable Copies - Doc. 124 - HMMA Obj to Exhibit Lists	32
2/9/2023	Billable Copies - Doc. 128 - HEA Obj to PL Depo Designations	116
2/9/2023	Billable Copies - Doc. 129 - HEA Obj to PL Exhibit List	6
2/9/2023	Billable Copies - Doc. 130 - Dynamic's Obj to Depo Designations	96
2/9/2023	Billable Copies - Doc. 131 - Dynamic's Obj to HEA Exhibit List	6
2/9/2023	Billable Copies - Doc. 132 - Dynamic's Obj to HMMA's Exhibit List	15
2/9/2023	Billable Copies - Doc. 133 - Dynamic's Obj to PL Exhibit List	19
2/9/2023	Billable Copies - Doc. 134 - Dynamic's Objections to Plaintiff's Witness List	3
2/22/2023	Billable Copies - Doc. 147 - Order on jury trial, extension, and reconsideration	0

2/28/2023 Billable Copies - Doc. 155 - Defendant's Voir Dire	8
3/8/2023 Billable Copies - Doc. 165 - Dynamic's Response to PL 1st MIL - Cureton as a Minister	7
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3/18/2024 Billable Copies - Doc. 213 - Memorandum Opinion and Order on Injunctive Relief	8
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9/27/2021 Billable Copies - doc. 47 and Doc. 47-1 Joint Motion for Protective Order and Protective Order	12
9/27/2021 Billable Copies - Doc. 48 - Privacy Protective Order	6
11/8/2021 Billable Copies - Doc. 49 - ORDER: it is ORDERED that this matter is SET for a hearing by status and scheduling conference on 11	1
11/30/2021 Billable Copies - Doc. 51 - UNIFORM SCHEDULING ORDER Final Pretrial Conference set for 9.22.2022,	5

4/13/2022	Billable Copies - Doc. 58 - NOTICE by Equal Employment Opportunity Commission of Appearance by Kurt Fischer	2
11/15/2022	Billable Copies - Doc. 87 - Dynamic reply brief	26
1/27/2023	Billable Copies - Doc. 92 - Order moving pretrial conference	1
1/27/2023	Billable Copies - Doc. 93 - HMMA Witness List	3
1/27/2023	Billable Copies - Doc. 94 - HMMA Deposition Designations	2
1/27/2023	Billable Copies - Doc. 95 - HMMA Exhibit List	6
1/27/2023	Billable Copies - Doc. 96 - HEA Witness List	3
1/27/2023	Billable Copies - Doc. 97 - HEA Exhibit List	3
1/27/2023	Billable Copies - Doc. 98 - Dynamic Exhibit List	4
1/27/2023	Billable Copies - Doc. 99 - Dynamic Exhibit List	8
8/1/2023	Billable Copies - Docs. 194-196 - Trial Transcript	510
8/1/2023	Billable Copies - Docs. 194-196 - trial transcript	510
10/13/2022	Billable Copies - Dynamic MSJ Copies (Docs. 73-75)	830
10/12/2022	Billable Copies - HEA MSJ Copies (Docs. 69-71)	498
10/12/2022	Billable Copies - HMMA MSJ Copies (Docs 66-68)	663
3/24/2023	Billable Copies - Juror Responses	674
11/15/2022	Billable Copies - Motion to Strike	5
6/21/2022	Billable Copies - Outsource - Color copies of exhibits for deposition	1
3/26/2023	Billable Copies - Staples Copy & Print - Trial Production - \$103.54	1
3/21/2023	Billable Copies - trial copies - deposition transcripts	332
3/21/2023	Billable Copies - Trial Exhibits	1518
3/28/2022	Billable Copies - Witness letters to Howell, Cureton, Scavella, Chambliss, and Robinson	5
9/6/2022	Billable Copies- Doc. 19 - DEPOSITION (Schutz) by Hyundai Motor Manufacturing Alabama LLC	103
4/18/2022	Billable Copies- doc. 61- Doc. 61-6 RESPONSE to Motion re [59] MOTION to Quash Subpoena filed by Hyundai Motor Manufactu	31
11/11/2022	Billable Copies- Doc. 84 - REPLY BRIEF in Response to Plaintiff's Brief filed by Hyundai	34
3/6/2023	Billable Copies-copying Contents for Trial Notebook	119
2/24/2023	Billable Copies- Doc 149-Proposed Jury Instructions by Davita M. Key	16
3/27/2023	Billable Copies- Doc oint MOTION for Protective Order (Motion for Entry of Protective Order)9 -	11
2/1/2023	Billable Copies- Doc. 105 - Exhibit List Defendant Dynamic Security, Inc.'s Amended Exhibit List by Dynamic Security, Inc.	8
2/1/2023	Billable Copies- Doc. 106 - ORDER: it is ORDERED that unopposed motion to continue (doc. [104]) is GRANTED and the pretrial c	1
2/1/2023	Billable Copies- Doc. 107 - MOTION for Leave to File Amended Exhibit List by Hyundai Motor Manufacturing Alabama, LLC	3
2/6/2023	Billable Copies- Doc. 109 - Deposition Designations (Responsive Designations of Deposition/Trial Excerpts) by Hyundai	4
2/6/2023	Billable Copies- Doc. 111 - MOTION for Leave to File - Defendant Hyundai ENG America, Inc.'s Motion for Leave to Amend its Tria	3

3/8/2023 Billable Copies-Doc. 173 - BRIEF/MEMORANDUM in Opposition re [161] Proposed Jury Instructions filed by Davita M. Key	8
3/20/2023 Billable Copies-Doc. 176 and 176-1 - BILL OF COSTS by Hyundai Motor Manufacturing Alabama, LLC.	9
3/20/2023 Billable Copies-Doc. 177 and 177-1 - BILL OF COSTS by Hyundai Engineering America, Inc., Hyundai Motor Manufacturing Alaba	10
3/27/2023 Billable Copies-Doc. 181 - Proposed Jury Verdict Form by Dynamic Security, Inc.	4
4/27/2023 Billable Copies-Doc. 197 - MOTION for Judgment as a Matter of Law Defendant Dynamic Security, Inc.'s Motion for Renewed Jud	72
4/27/2023 Billable Copies-Doc. 198ORDER: it is ORDERED that the Dft shall file a response to the Plf's	1
9/6/2022 Billable Copies-Doc. 20 - DEPOSITION (Muldraw) by Hyundai Motor Manufacturing Alabama LLC. (A	87
5/3/2023 Billable Copies-Doc. 200-MOTION for Extension of Deadline Time to File Petition for Attorneys' Fees and Bill of Cost	3
6/28/2023 Billable Copies-Doc. 206 - RESPONSE in Opposition re [197] MOTION for Judgment as a Matter of Law Defendant	60
7/6/2023 Billable Copies-Doc. 208 - MOTION for Extension of Time to File Response/Reply as to [206] Response in Opposition to Motion	3
6/28/2023 Billable Copies-Doc. 209 - RESPONSE in Opposition re [193] MOTION for Equitable Relief of Reinstatement of Interest filed by D	9
7/10/2023 Billable Copies-Doc. 210-REPLY to Response to Motion re [193] MOTION for Equitable Relief	8
9/21/2022 Billable Copies-Doc. 23 - REPLY to re [22] filed by Hyundai Motor Manufacturing Alabama LLC	48
1/18/2022 Billable Copies-Doc. 53 - ORDER: Construing the 52 Motion to Substitute Counsel as a Motion to Withdraw as Counsel;	1
1/18/2022 Billable Copies-Doc. 54 - NOTICE of Appearance by Thomas Matthew Miller on behalf of Hyundai Engineering America, Inc. (Mill	3
1/18/2022 Billable Copies-Doc. 55 - NOTICE of Appearance by Cortlin Lee Bond on behalf of Hyundai Engineering America, Inc.	3
3/28/2022 Billable Copies-Doc. 56 - MOTION to Amend/Correct [51] Scheduling Order	6
3/31/2022 Billable Copies-Doc. 57 - Order that Motion to Amend be granted	4
4/27/2022 Billable Copies-Doc. 62 - ORDER: it is ORDERED that the Board's [59] Motion to Quash is DENIED, as further set out in Order	2
8/22/2022 Billable Copies-Doc. 64 - ORDER: Now pending before the Court is Plaintiff Davita M. Key's motion	2
9/15/2022 Billable Copies-doc. 65 - Notice of Mediation and Settlement Conference by Davita M. Key	3
10/14/2022 Billable Copies-Doc. 72-MOTION for Leave to File Supplemental Brief by Hyundai Motor Manufacturing Alabama, LLC.	4
10/13/2022 Billable Copies-Doc. 77 - ORDER TO SHOW CAUSE, by the PLF, as to why the [72] Motion	1
10/25/2022 Billable Copies-Doc. 79 - 792 - RESPONSE in Opposition re [72] MOTION for Leave to File Supplemental Brief filed by Davita M. K	24
10/27/2022 Billable Copies-Doc. 80 - ORDER: it is ORDERED that Dft's [72] Motion for Leave to File Supplemental Brief is DENIED	2
11/7/2022 Billable Copies-Doc. 82 - BRIEF/MEMORANDUM in Opposition re [68] Evidentiary Submission	85
11/11/2022 Billable Copies-doc. 86 - REPLY BRIEF re [70] BRIEF/MEMORANDUM in Support, [71] Evidentiary Submission	16
1/2/2023 Billable Copies-Doc. 89 - MOTION to Strike Plaintiff's Demand for Jury Trial by Dynamic Security, Inc..	80
1/19/2023 Billable Copies-Doc. 91 - 91-2 - RESPONSE in Opposition re [89] MOTION to Strike Plaintiff's Demand for Jury Trial	44
2/1/2023 Billable Copies-Doc. 92 - ORDER: it is ORDERED that the pretrial conference presently set for 2/2/2023, is RESET to 11:00 AM or	1
11/11/2022 Billable Copies-MOTION for Extension of Time to File Response/Reply as to [82] BRIEF/MEMORANDUM	7
3/29/2023 Billable Copies-MOTION for Judgment as a Matter of Law Defendant Dynamic Security Inc.'s	6
1/13/2022 Billable Copies-MOTION to Substitute Attorney by Hyundai Engineering America, Inc..	3



Receipt

Order Details

Order Number:	6936084803
Order Date:	Mar. 21, 2023
Delivery items ship to	
Pickup products at	Birmingham Store 4614 Hwy 280 Birmingham, AL 35242

Payment Details

Trial Copies

INVOICE TO

James Leonard
2105 Devereux Circle
Suite 111, Vestavia Hills, AL35243

Payment Method

PayOnline

Order Summary

ITEM	QTY	PRICE
Pickup Products		
Trial Exhibits to Print.pdf	5	\$194.81
Trial Exhibits to Print.pdf	1	\$48.20
8044773 Key.Davita M. 062022.miniprint.pdf	3	\$55.57
CuretonRay083022-CT.pdf	3	\$58.59
Key v Hyundai, Dynamic, Spiers-CT-LE.pdf	3	\$28.70
Key v Hyundai, Riddle-CT-LE.pdf	3	\$70.32
UnemploymentHearingTranscription,9-19-17-CT.pdf	3	\$23.37
WILLIAMS, Cassandra 09.06.2022_cond_N_ex_CERTIFIED ORIGINAL (blue).pdf	3	\$38.66
Subtotal		\$518.22
Estimated Tax		\$25.91
Total		\$544.13



8/19/2022 Billable Copies-MOTION to Take Deposition from Cassandra Williams/HEA 30(b)(6) on September 6, 2022 4

8/22/2022 Billable Copies-Print pages for deposition preparation Ray Cureton 127

Total - Billable 10900

Total - Non-Billable

Total - Write Off

☐ Staples

Receipt**Order Details**

Order Number	6935572727
Order Date	Feb.07,2023
Delivery items ship to	
Pickup products at	4614 Hwy 280, Birmingham, AL 35242

Payment Details*Trial Notebook*

INVOICE TO Jim Leonard 2105 Devereux Circle, Suite 111, Birmingham, AL 35243
PAYMENT METHOD PayOnline

Order Summary

ITEM	QUANTITY	PRICE
Pickup Products		
Key v HMMA Notebook (Simple Print)	1	\$54.63
SUBTOTAL		\$54.63
SHIPPING & HANDLING		\$0.00
ESTIMATED TAX		\$2.74
TOTAL		\$57.37



6935572727

All orders must be paid for at the time of
order to be entered into production.



4614 Hwy 280
Birmingham, AL 35242
205-980-0596

Sale

Store: 1188 Register: 5
Date: 8/3/23 Time: 11:11 AM
Transaction: 13019 Cashier: 2032642

REWARDS NUMBER 2847798069

Qty	Item	Price	Amount
	SELF-SERVE B&W POS		
280	24517274	0.18	50.40
	STPLS HD VIEW BIND		
1	718103406420	10.99	10.99

Subtotal 61.39
ALABAMA 9% 5.53

Total 66.92

AMERICAN EXPRESS USD\$66.92

Card No. : [REDACTED]

Contactless

Auth No. : 837738

Mode.: Issuer

AID.: A000000025010801

TVR.: 000008000

IAD.: 06580103A02002

TSI.: E800

ARC.: 3030

Staples,
the working and learning store.
Discover every tool to take on tomorrow
including products, services
and inspiration that help you
unlock what is possible.

Shop Smarter. Get Rewarded.
Staples Rewards members get up to
5% back in Rewards.
Exclusions Apply. See an associate for
full program details or to enroll.

THANK YOU FOR SHOPPING AT
STAPLES!



01133PN11911PAP4AXIRE

Customer Copy

Your first stop
to nonstop travel.

With TSA PreCheck enrollment available at
select Staples stores, its easier than
ever to upgrade your travel. To find a
participating location, visit

Copies of
post-trial
motions
(

to assign
with the
[redacted]
[redacted]

[redacted]



Dynamic 30(b)(6) and Cureton
Deposition Exhibits 1 set

Order Date 08/18/2022 1:30pm

Order Details

Pickup

OfficeMax

5275 Highway 280 South Ste 101
Birmingham, AL 35242 USA
(205) 980-2511

Order Summary

Order Placed Aug 18, 2022

Item Subtotal: \$33.26

Taxes: \$2.99

Order Total \$36.25

Payment

Account #: 98344785

Amount: \$36.25



Additional Info

Ordered By: PALMERLAWAL

Phone: (105) 285-3050

Last Updated: 08/18/2022

Updated By: JWWW

Store Pickup 1 of 1

ORDER NUMBER	ORDER STATUS	TOTAL
263136745-001	Ready For Pickup	\$36.25

Ready for Pickup Today



Copies
Item #870284
Qty: 1 @ \$34.32 / each
\$34.32
▶ Custom Product
Comments: Print Merge



Item Subtotal:	\$33.26
Taxes:	\$2.99
Order Total	\$36.25

CLH Investigations

Post Office Box 241806
Montgomery, Alabama 36124
(334) 618-0498
clhinvestigations@gmail.com

March 21, 2023

Heather Newsom Leonard
Heather Leonard, P.C.
2105 Devereux Circle, Suite 111
Birmingham, Alabama 35243

RE: Key v. Dynamic Security

Traveled to 1261 Cross Creek Road, Prattville, AL on
three occasions (no answer at door); telephone Mr.
Cureton; research Mr. Cureton's current address;
service perfected upon Ray Cureton at
749 Charlemont Lane, Montgomery, AL 36117

\$200.00

*Thank you
Charlotte L. Henderson*



IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
Plaintiff,)	
,)	
v.)	Case No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendants.)	

Witness Fee Checks

Name	Amount	Entered in Billing?
Ray Cureton	\$66.07	<input checked="" type="checkbox"/>
Sherry Spires	\$308.75	<input checked="" type="checkbox"/>

Scans of Checks available
on request - not scanned &
filed w/bill of cost to
avoid banking info being
in the record



Alabama Court Reporting, Inc.

717 Church Street NW
 Huntsville, AL 35801
 Phone: (877) 478-3376



Accounts Payable Esquire Solutions
 Esquire Deposition Solutions, LLC
 1500 Centre Parkway
 Suite 100
 Atlanta, GA 30344

Invoice #38157

Date	Terms
07/05/2022	Due on receipt

Depo/Job #35114 on 06/20/2022

Affiliate Depo/Job#: (Esquire job #J8044773)
Case: Davita M. Key v. Hyundai Motor
 Manufacturing Alabama, LLC; Hyundai
 Engineering America, Inc.; and Dynamic
 Security, Inc.
Court Docket#: 2:19-CV-00767-ECM-SMD
Location: Hyundai Training Center
 700 Hyundai Boulevard, Gate 3
 Montgomery, AL 36105

Shipped On: 07/05/2022
Shipped Via: Electronic Only
Tracking #: Esquire Portal
Delivery Type: Normal
Resource: Lewis, Sabrina

Description	Amount
Davita M. Key	
Appearance Fee Full Day	\$ 200.00
Transcript Original	\$ 1,033.20
Transcript Copy	\$ 2,281.65
	<hr/>
	\$ 3,514.85

Amount Due: \$ 3,514.85
 Paid: \$ 3,514.85

Esquire Job #J8044773

Balance Due:	\$ 0.00
Payment Due:	Upon Receipt

READ & SIGN REQUESTED BY HEATHER LEONARD
ORIG EXH SENT 7-1-22

ORDERS:

Middlebrooks - Per Diem, Original, Original Exh
Leonard - Copy, Exh, READ & SIGN
Miller - Copy, Exh
Redmond - Copy, Exh

*****PLEASE NOTE NEW MAILING ADDRESS ABOVE!!*****

Tax ID - 47-3910921

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Alabama Court Reporting, Inc

109 Jefferson St. North Suite 8
 Huntsville, AL 35801
 Phone: (877) 478-3376



Heather Leonard, Esq.
 Heather Leonard, P.C.
 2105 Devereux Circle
 Suite 111
 Birmingham, AL 35243

Invoice #39077

Date	Terms
09/21/2022	Due on receipt

Depo/Job #36228 on 09/06/2022

Case: Davita M. Key v. Hyundai Motor
 Manufacturing Alabama, LLC; Hyundai
 Engineering America, Inc.; and Dynamic
 Security, Inc.

Court Docket#: 2:19-CV-00767-ECM-SMD

Location: Bradley, Arant, Boulton & Cummings LLP
 (Montgomery)
 RSA Dexter Avenue Building
 445 Dexter Avenue, Suite 9075
 Montgomery, AL 36104

Shipped On:

Shipped Via: Etrans w/UPS shipped orig exh

Delivery Type: Normal

Resource: Groves, Jordan

Description	Amount
Cassandra Williams	
Appearance Fee Half Day	\$ 100.00
Transcript Original	\$ 573.05
Condensed w/Hyperlinked Exhibits	\$ 55.00
Exhibits, Scanned	\$ 24.00
Transcript Cloud Storage, per deponent	\$ 12.00
Shipping	\$ 32.00
	<hr/>
	\$ 796.05

Amount Due: \$ 796.05
 Paid: \$ 0.00

Electronic Delivery + Original exhibits returned via UPS

**Read & Sign sent via email to T. Matthew Miller - mmiller@bradley.com;
 lhawkins@bradley.com**

Balance Due:	\$ 796.05
Payment Due:	Upon Receipt

Tax ID - 47-3910921

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Heather Leonard
Heather Leonard, PC
2105 Devereux Circle
Suite 111
Vestavia, AL 35243-2564

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
20035	9/13/2022	11899
Job Date	Case No.	
8/30/2022	2:19-CV-767-ECM-SMD	
Case Name		
Key v. Hyundai Motor Manufacturing Alabama LLC., et al.		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Ray Cureton					732.32
Half Day Per Diem	1.00	@	80.000	80.00	
Technical/Video	199.00	Pages	@	0.550	109.45
Scanned exhibits	128.00	@	0.300	38.40	
Processing	1.00	@	20.000	20.00	
Ray Cureton - Video					400.00
Setup and First Hour	1.00	@	300.000	300.00	
Additional Video Hour	3.00	Hours	@	100.000	300.00
Synchronized Video Hour	4.00	Hours			
Video archiving	1.00	@	20.000	20.00	
TOTAL DUE >>>					\$2,000.17

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Cite, LLC
PO Box 6173
Montgomery, AL 36106

THANK YOU!

Tax ID: 82-1643675

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Heather Leonard
Heather Leonard, PC
2105 Devereux Circle
Suite 111
Vestavia, AL 35243-2564

Invoice No. : 20035
Invoice Date : 9/13/2022
Total Due : \$2,000.17

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 11899
BU ID : CITE BHAM
Case No. : 2:19-CV-767-ECM-SMD
Case Name : Key v. Hyundai Motor Manufacturing
Alabama LLC., et al.



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
20266	9/28/2022	11766
Job Date	Case No.	
8/19/2022	2:19-CV-767-ECM-SMD	
Case Name		
Key v. Hyundai Motor Manufacturing Alabama LLC., et al.		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Kristal Riddle

259.00 Pages @ 3.680 953.12

Full Day Per Diem

1.00 @ 160.000 160.00

Scanned exhibits

3.00 @ 0.300 0.90

Processing

1.00 @ 20.000 20.00

ORIGINAL TRANSCRIPT OF:

Sherry Spiers

109.00 Pages @ 3.680 401.12

Scanned exhibits

195.00 @ 0.300 58.50

Processing

1.00 @ 20.000 20.00

TOTAL DUE >>> \$1,613.64

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Tax ID: 82-1643675

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Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 20266
Invoice Date : 9/28/2022
Total Due : \$1,613.64

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 11766
BU ID : CITE BHAM
Case No. : 2:19-CV-767-ECM-SMD
Case Name : Key v. Hyundai Motor Manufacturing
Alabama LLC., et al.



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
20254	9/28/2022	12169
Job Date	Case No.	
9/23/2022		
Case Name		
State of Alabama Hearings and Appeals Unit		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Unemployment Hearing

Writing Time

Processing

59.00	Pages	@	6.300	371.70
1.00	Hours	@	55.000	55.00
1.00		@	20.000	20.00

TOTAL DUE >>> \$446.70

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Cite, LLC
PO Box 6173
Montgomery, AL 36106

THANK YOU!

Tax ID: 82-1643675

Please detach bottom portion and return with payment.

Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 20254
Invoice Date : 9/28/2022
Total Due : \$446.70

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 12169
BU ID : CITE BHAM
Case No. :
Case Name : State of Alabama Hearings and Appeals Unit



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
19091	7/6/2022	11184
Job Date	Case No.	
6/22/2022	2:19-CV-767-ECM-SMD	
Case Name		
Key v. Hyundai Motor Manufacturing Alabama LLC., et al.		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Robert Burns
Full Day Per Diem
Conference Room
Scanned exhibits
Processing

388.00	Pages	@	3.680	1,427.84
1.00		@	160.000	160.00
1.00		@	420.000	420.00
298.00		@	0.300	89.40
1.00		@	20.000	20.00
TOTAL DUE >>>				\$2,117.24

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Montgomery, AL 36106

THANK YOU!

Tax ID: 82-1643675

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Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 19091
Invoice Date : 7/6/2022
Total Due : \$2,117.24

*Paid
8/29*

Remit To: Cite, LLC
PO Box 6173
Montgomery, AL 36106

Job No. : 11184
BU ID : CITE BHAM
Case No. : 2:19-CV-767-ECM-SMD
Case Name : Key v. Hyundai Motor Manufacturing
Alabama LLC., et al.

INVOICE

1 of 1



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No.	Invoice Date	Job No.
19091	7/6/2022	11184
Job Date	Case No.	
6/22/2022	2:19-CV-767-ECM-SMD	
Case Name		
Key v. Hyundai Motor Manufacturing Alabama LLC., et al.		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Robert Burns

Full Day Per Diem

Conference Room

Scanned exhibits

Processing

388.00	Pages	@	3.680	1,427.84
1.00		@	160.000	160.00
1.00		@	420.000	420.00
298.00		@	0.300	89.40
1.00		@	20.000	20.00

TOTAL DUE >>>**\$2,117.24**

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Tax ID: 82-1643675*Please detach bottom portion and return with payment.*

Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 19091
Invoice Date : 7/6/2022
Total Due : \$2,117.24

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 11184
BU ID : CITE BHAM
Case No. : 2:19-CV-767-ECM-SMD
Case Name : Key v. Hyundai Motor Manufacturing
Alabama LLC., et al.

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BY MARRIOTT

SPRINGHILL SUITES BY MARRIOTT® / MONTGOMERY DOWNTOWN
 152 Coosa Street, Montgomery, AL 36104 P 334.245.2088
springhillsuites.com

Heather/Mrs Leonard	Room: 411			
2105 Devereux Cir Ste 111	Room Type: KSOF			
Vestavia AL 35243-2564	Number of Guests: 2			
Travel	Rate: \$303.00	Clerk: DSW		
Arrive: 26Mar23	Time: 04:29PM	Depart: 29Mar23	Time: 07:57AM	Folio Number: 71304

DATE	DESCRIPTION	CHARGES	CREDITS
26Mar23	Daily Parking	25.00	
26Mar23	Room Charge	185.00	
26Mar23	State Occupancy Tax	7.40	
26Mar23	City Tax	20.35	
26Mar23	County Tax	2.25	
27Mar23	Daily Parking	25.00	
27Mar23	Room Charge	220.00	
27Mar23	State Occupancy Tax	8.80	
27Mar23	City Tax	24.20	
27Mar23	County Tax	2.25	
28Mar23	Daily Parking	25.00	
28Mar23	Room Charge	303.00	
28Mar23	State Occupancy Tax	12.12	
28Mar23	City Tax	33.33	
28Mar23	County Tax	2.25	
29Mar23	American Express		895.95

Card #: XXXXXXXXXXXXXXXXXX
 Card Type: AMEX Card Entry: CHIP Approval Code: App
 Label: AMERICAN EXPRESS AID: 1000000025010801

BALANCE: 0.00

Marriott Bonvoy Account # XXXXX1438. Your Marriott Bonvoy points/miles earned on your eligible earnings will be credited to your account. Check your Marriott Bonvoy account statement or your online statement for updated activity.

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 152 Coosa Street, Montgomery, AL 36104 P 334.245.2088
springhillsuites.com

Heather/Mrs Leonard Room: 412
 2105 Devereux Cir Ste 111 Room Type: KSOF
 Vestavia AL 35243-2584 Number of Guests: 2
 Travel Rate: \$303.00 Clerk: DSW
 Arrive: 26Mar23 Time: 06:41PM Depart: 29Mar23 Time: 07:58AM Folio Number: 71305

DATE	DESCRIPTION	CHARGES	CREDITS
26Mar23	Room Charge	185.00	
26Mar23	State Occupancy Tax	7.40	
26Mar23	City Tax	20.35	
26Mar23	County Tax	2.25	
27Mar23	Room Charge	220.00	
27Mar23	State Occupancy Tax	8.80	
27Mar23	City Tax	24.20	
27Mar23	County Tax	2.25	
28Mar23	Room Charge	303.00	
28Mar23	State Occupancy Tax	12.12	
28Mar23	City Tax	33.33	
28Mar23	County Tax	2.25	
29Mar23	American Express		820.95
Card #: XXXXXXXXXXXXXXXX Card Type: AMEX Card Entry: CHIP Approval Code: App Label: AMERICAN EXPRESS AID:			
		BALANCE:	0.00

Marriott Bonvoy Account # XXXXX1438. Your Marriott Bonvoy points/miles earned on your eligible earnings will be credited to your account. Check your Marriott Bonvoy account statement or your online statement for updated activity.

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[REDACTED]

Palmer Law LLC
2052853050

104 23rd Street South,
Suite 100
Birmingham, AL 35233
US

Amount Due

\$4,182.58

Billed To

Davita Key
3044 Spring Hill Parkway SE Apt E
Smyrna, GA 30080

Matter

Key v. HMMA et al

Invoice Number

00006

Date of Issue

03/28/2024

Due Date

04/27/2024

Expense Entries

Date	Description	Rate	Qty	Line Total
07/27/2022	Unemployment Hearing Audio File	\$5.00	1.00	\$5.00
08/29/2022	HMMA 30(b)(6) Deposition	\$2,117.24	1.00	\$2,117.24
10/20/2022	Unemployment Hearing Transcript	\$446.70	1.00	\$446.70
10/20/2022	Dynamic Security 30(b)(6) Deposition	\$1,613.64	1.00	\$1,613.64
Expenses Total:			4	\$4,182.58
Total				\$4,182.58
Amount Due				\$4,182.58

Outstanding Invoices

Number	Due Date	Amount	Payments	Balance
00006 (current)	04/27/2024	\$4,182.58	\$0.00	\$4,182.58
Outstanding Balance				\$4,182.58

Palmer Law LLC
2052853050

104 23rd Street South,
Suite 100
Birmingham, AL 35233
US

Amount Due

\$4,182.58

Billed To

Davita Key
3044 Spring Hill Parkway SE Apt E
Smyrna, GA 30080

Matter

Key v. HMMA et al

Invoice Number

00006

Date of Issue

03/28/2024

Due Date

04/27/2024

Expense Entries

Date	Description	Rate	Qty	Line Total
07/27/2022	Unemployment Hearing Audio File	\$5.00	1.00	\$5.00
08/29/2022	HMMA 30(b)(6) Deposition	\$2,117.24	1.00	\$2,117.24
10/20/2022	Unemployment Hearing Transcript	\$446.70	1.00	\$446.70
10/20/2022	Dynamic Security 30(b)(6) Deposition	\$1,613.64	1.00	\$1,613.64
Expenses Total:			4	\$4,182.58
Total				\$4,182.58
Amount Due				\$4,182.58

Outstanding Invoices

Number	Due Date	Amount	Payments	Balance
00006 (current)	04/27/2024	\$4,182.58	\$0.00	\$4,182.58
Outstanding Balance				\$4,182.58